

Louisiana Katrina/Rita NESHAP Matrix

(residential structures of 4 units or less- no condos, apartments or commercial buildings)

TYPE OF STRUCTURE	ACTIVITY	NESHAP	FLEXIBILITY WITH NAA LTR
UNSOUND STRUCTURE (structure subject to a governmental demolition order for which a thorough inspection is not possible)	inspection	Thorough inspection not required (due to structure being structurally unsound and in imminent danger of collapse). Structure is subject to a governmental demolition order.	<ol style="list-style-type: none"> 1. Unsound structure definition expanded to include homes that are structurally unsound or moved off their foundation but not necessarily in danger of imminent collapse. (2/3/06-9/3/07ext) 2. Government issued demolition orders for groups of covered residences (e.g. a block, sub-division, or other appropriate geographic area) the same as an order based on individual determination. (2/3/06-9/3/07ext) 3. Unsound structures definition expanded to include homes that are uninhabitable for other environmental reasons. (2/24/06-9/3/07ext)
	pre-demolition	<p>RACM removal not possible due to condition of structure</p> <p>Note: Exterior RACM may be removed (by certified contractor) if no visible emissions are generated, but all waste (both removed RACM and all other material from the remaining standing structure) must be disposed of in a NESHAP compliant landfill</p>	N/A

* This is a general summary of the asbestos NESHAP requirements. The matrix does not include administrative requirements related to compliance with the asbestos NESHAPs (such as notification requirements). In order to determine the precise asbestos NESHAP requirements and EPA's No Action Assurance requirements that might apply in any given situation, please refer to the asbestos NESHAP regulations at 40 CFR Part 61, Subpart M and the specific No Action Assurance letters.

	demolition	<ol style="list-style-type: none"> 1. Must be wetted throughout demolition process (i.e. prior to and during the demolition process) to eliminate visible emissions. 2. Asbestos trained manager/supervisor must be present 	N/A
	transportation	Manage waste streams as RACM (wet and covered trucks)	N/A
	disposal	<ol style="list-style-type: none"> 1. State asbestos permitted landfill, or 2. NESHAP compliant C&D landfill 	1. Disposal of asbestos containing material in Enhanced C&D Landfills that are NESHAP compliant for post 1980 and all unsound residential structures per LDEQ determination. (2/24/06-9/3/07ext)
	inspection	<ol style="list-style-type: none"> 1. Certified Inspectors required 2. Thorough inspection required of each structure (Attachment 1) 3. Structure is subject to a governmental demolition order. 	N/A
SOUND STRUCTURE (structure subject to governmental demolition order thoroughly inspected)	pre-demolition	RACM removal <ol style="list-style-type: none"> 1. Certified contractor required 2. Adequately wet prior to removal to eliminate visible emissions. 3. Handle material in a way to prevent damage. 	N/A
	Demolition	Once RACM removed, no additional requirements- only C&D remaining (handle according to State/local requirements)	N/A

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	transportation	<ol style="list-style-type: none"> 1. RACM waste- place in leak-proof containers, wet, covered truck 2. C&D- no requirements (handle according to State/local requirements) 	N/A
	disposal	<ol style="list-style-type: none"> 1. RACM waste- State asbestos permitted landfill 2. C&D waste- No requirements (handle according to State/local requirements) 	N/A

Attachment

Revised 2/2/07 (NAA Extension)

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